

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

PIONEER HI-BRED INTERNATIONAL,)
INC.; CORTEVA AGRISCIENCE, LLC;)
AGRELIANT GENETICS, LLC; BECK'S)
SUPERIOR HYBRIDGS, INC.; and)
WINFIELD SOLUTIONS, LLC,)

Plaintiffs,)

v.)

ALTEN, LLC; MEAD CATTLE)
COMPANY, LLC; GREEN DISPOSAL)
MEAD, LLC; PLATTE RIVER GREEN)
FUELS, LLC; and TANNER SHAW, in his)
Individual and official capacities,)

Defendants.)

Case No. 8:22-cv-00070

SYNGENTA SEEDS, LLC,)

Plaintiff,)

v.)

ALTEN, LLC; MEAD CATTLE)
COMPANY, LLC; GREEN DISPOSAL)
MEAD, LLC; PLATTE RIVER GREEN)
FUELS, LLC; TANNER SHAW and)
SCOTT TINGELHOFF,)

Defendants.)

Case No. 8:22-cv-00071

BAYER US LLC,)

Plaintiff,)

v.)

ALTEN, LLC; MEAD CATTLE)
COMPANY, LLC; GREEN DISPOSAL)
MEAD, LLC; PLATTE RIVER GREEN)

Case No. 8:22-cv-00082

FUELS, LLC; and TANNER SHAW, in his)
Individual and official capacities,)
)
Defendants.)

STIPULATED MOTION FOR EXTENSION OF TIME TO FILE
A JOINT STIPULATION FOR DISMISSAL

The Defendants Defendants AltEn, LLC; Mead Cattle Company, LLC; Green Disposal Mead, LLC; Platte River Green Fuels, LLC; Earth, Energy, & Environment, LLC; AltEn Operating Co. LLC; E3 Biofuels, LLC; Integrated Recycling, LLC; Falcon Energy, LLC; Mead Acquisition Company, LLC; and Tanner Shaw and Scott Tingelhoff (“Defendants”), in the above-captioned cases and Plaintiffs Bayer US LLC; Pioneer Hi-Bred International, Inc.; Corteva Agriscience, LLC; AgReliant Genetics, LLC; Beck’s Superior Hybrids, Inc.; Winfield Solutions, LLC; and Syngenta Seeds, LLC (“Plaintiffs”) in the above-captioned cases, hereby request an order extending the parties’ deadline to file a joint stipulation for dismissal. In support of said stipulated motion the parties state the following:

1. On April 24, 2025, the parties filed a Joint Notice of Settlement (Filing No. 157, Case No. 8:22-cv-70; Filing No. 150, Case No. 8:22-cv-71; Filing No. 150, Case No. 8:22-cv-82).
2. On March 26, 2025, the Court entered an Order staying all progression deadlines and setting a deadline of July 1, 2025 for the parties to electronically file a joint stipulation for dismissal (or other dispositive stipulation) that will fully dispose of the case. (Filing No. 156, Case No. 8:22-cv-70).
3. Pursuant to the parties’ settlement agreement, AltEn, LLC has recorded a temporary construction easement to provide FRG unrestricted access to the AltEn Site.
4. Pursuant to the parties’ settlement agreement, Defendant AltEn has been working diligently to record uniform environmental covenants (“UECs”) on the parcels comprising the

AltEn Site containing such restrictions on use as may be requested by the Nebraska Department of Environment and Energy (“NDEE”).

5. As requested by the NDEE, Defendant AltEn has contacted the parties who may have a legal or equitable interest in the AltEn Site to determine if they would be willing to execute a subordination agreement to be bound by the UECs. To date, the third parties who have agreed to execute a subordination agreement are Saunders County, Village of Mead, 3801 Harney, LLC, AM JJ Investments, LLC, and Champion Feeders. The parties who have not yet agreed to execute a subordination agreement are Raka, JBGB Investments, and Casilda Land Holdings, LLC.

6. Defendants have been working in cooperation with the Nebraska Attorney General’s Office and the NDEE to effectuate the UECs and have been reporting the progress in obtaining the subordination agreements.

7. The parties have been in communication and anticipate that Defendant AltEn will be unable to record the UECs on the parcels comprising the AltEn Site before the July 1, 2025 deadline to file a joint stipulation for dismissal.

8. The parties stipulate and respectfully request this Court to extend the July 1, 2025 deadline to file a joint stipulation for dismissal so that Defendant AltEn may continue efforts to obtain the subordination agreements and then record the UECs as requested by the NDEE.

WHEREFORE, Defendants and Plaintiffs in the above-captioned cases, pray that this Court enter an Order granting the parties until September 2, 2025, to electronically file a joint stipulation for dismissal (or other dispositive stipulation) that will fully dispose of the case.

Respectfully submitted,

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SYNGENTA SEEDS, LLC, Plaintiff

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